



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Allen County
Lima Refining Company
Premise #0302020012
Warning Letter

January 14, 2009

CERTIFIED MAIL
7002 2410 0003 1155 8706

Mr. Roy Warnock, Vice President & General Manager
Lima Refining Company
1150 South Metcalf Street
Lima, Ohio 45804-1145

Dear Mr. Warnock:

The Third Quarter 2008 Excess Emissions Report (EER) submitted by Lima Refining Company on October 17, 2008 has been reviewed by the Division of Air Pollution Control - Northwest District Office (DAPC/NWDO) and our Central Office (DAPC/CO). Data summaries in the EER indicate continuous emission monitor (CEM) data capture less than the minimum acceptable 95 percent for the following:

92.17 percent data capture (7.83 percent CEM down time) for the hydrogen sulfide CEM which is located on the common header of the east side refinery fuel gas system, and is used to determine compliance for fuel firing in the following emissions units:

B026 – CE Power Boiler;

B027 – Coker Furnace; and

B028 – Process Heater for Catalytic Gasoline Hydrotreating Unit

The excessive CEM down time is a violation of the following:

1. Part III, terms A.III.1. and A.III.3 for emissions units B026 and B027 in the facility's Title V permit modification which became effective on November 28, 2005;

Mr. Roy Warnock
January 14, 2009
Page 2

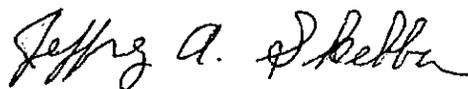
2. Part III, terms A.III.2. and A.III.4 for emissions unit B028 in the facility's Title V permit modification which became effective on November 28, 2005; and
3. Ohio Revised Code 3704.05.

Based on information received from the company, the CEM down time was caused primarily by intermittent monitor maintenance, out of control periods between July 2 and July 27, 2008 due to problems initiating the automatic calibration sequence, and high calibration drift. These resulted in a total of 8,297 minutes of CEM down time. It was discovered that three solenoid valves were leaking.

The company took prompt corrective actions to minimize CEM down time that included rebuilding of the three solenoid valves. Based on these actions, we have determined that the compliance plan is acceptable. The actions taken have corrected the violations and this CEM is now being operated in compliance with the permit requirements. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for these violations. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

If you have any questions, feel free to contact me at (419) 373-3128.

Sincerely,



Jeffrey A. Skebba
Environmental Specialist
Division of Air Pollution Control

/csl

pc: Tom Kalman - DAPC/CO
Don Waltermeyer - DAPC/NWDO
DAPC-NWDO File

03 02020012

Lima Refining

1/14/09

7002 2410 0003 1155 8706

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Postage	\$ 1.42	
Postage Due	2.70	
Postage Refund	2.20	
Postage & Fees	\$ 5.32	

DAPC/Jeff S.
csl

LIMA REFINING CO
1150 SOUTH METCALF ST
LIMA OH 45804-1145

PS Form 3800, June 2002

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

R ROY WARNOCK VPRES G MGR
LIMA REFINING CO
1150 SOUTH METCALF ST
LIMA OH 45804-1145

DAPC/Jeffrey Skebba/csl.

2. Article Number
(Transfer from service label)

7002 2410 0003 1155 8706

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Agent
 Addressee

B. Received by (Printed Name)
C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes